

***National
Environmental
Achievement Track***

Application Form

TDK Components USA , Inc.

Name of facility

TDK U.S.A. CORPORATION

Name of parent company (if any)

1 TDK Blvd.

Street address

Street address (continued)

Peachtree City Ga. 30269

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name William Nutt

Title EMS Manager

Phone 770-631-0410 ext. 212

Fax 770-631-0425

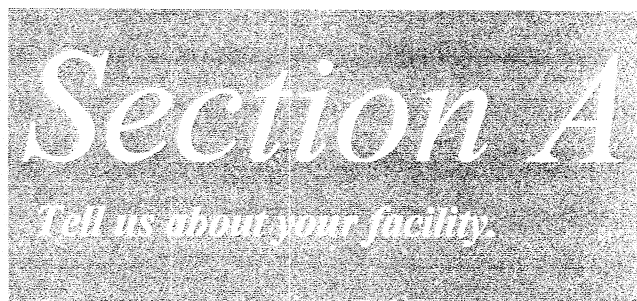
E-mail bnutt@tdktca.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Multilayer Ceramic Chip Capacitors

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3675

NAICS
334414

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

GAD980708762

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

TDK Components has aquired QS 9000 / ISO9002 and ISO 14001 Certifications.

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility,* Question 6. The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: TDK Components USA, Inc.

Facility Location: 1 TDK Blvd. Peachtree City Ga. 30269

Facility ID Number(s): GAD 980708762
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

- | | | |
|---|---|---|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | G | ✓ |
| 2. Permits and Registration of Air Pollution Sources | G | ✓ |
| 3. General Emission Standards, Prohibitions and Restrictions | G | ✓ |
| 4. Control of Incinerators | G | |
| 5. Process Industry Emission Standards | G | |
| 6. Control of Fuel Burning Equipment | G | |
| 7. Control of VOCs | G | ✓ |
| 8. Sampling, Testing and Reporting | G | |
| 9. Visible Emissions Standards | | G |
| 10. Control of Fugitive Dust | G | |
| 11. Toxic Air Pollutants Control | | G |
| 12. Vehicle Emissions Inspections and Testing | | G |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)

13. COMBINED AIR PERMIT WITH TDK ELECTRONICS G
PERMIT # 3695-113-0017-S-02-0.

14. _____ G

Hazardous Waste Management Regulations

- | | | |
|----|---|-----|
| 1. | Identification and Listing of Hazardous Waste (40 CFR 261) | G ✓ |
| | - Characteristic Waste | G ✓ |
| | - Listed Waste | G ✓ |
| 2. | Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | G ✓ |
| | - Manifesting | G ✓ |
| | - Pre-transport requirements | G ✓ |
| | - Record keeping/reporting | G ✓ |
| 3. | Standards Applicable to Transporters of Hazardous Waste (40 CFR 263) | G |
| | - Transfer facility requirements | G |
| | - Manifest system and record-keeping | G |
| | - Hazardous waste discharges | G |
| 4. | Standards for Owners and Operators of TSD Facilities (40 CFR 264) | G |
| | - General facility standards | G |
| | - Preparedness and prevention | G |
| | - Contingency plan and emergency procedures | G |
| | - Manifest system, Record keeping and reporting | G |
| | - Groundwater protection | G |
| | - Financial requirements | G |
| | - Use and management of containers | G |
| | - Tanks | G |
| | - Waste piles | G |
| | - Land treatment | G |
| | - Incinerators | G |
| 5. | Interim Status Standards for TSD Owners and Operators (40 CFR 265) | G |
| 6. | Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) | G |
| 7. | Administered Permit Program (Part B) (40 CFR 270) | G |

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- | | | |
|----|---|---|
| 8. | <u>40 CFR 266.70 SUB PART F (PRECIOUS METALS)</u> | G |
| 9. | _____ | G |

Hazardous Materials Management

- | | | |
|----|---|------------|
| 1. | Control of Pollution by Oil and Hazardous Substances (33 CFR 153) | G |
| 2. | Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) | G ✓ |
| 3. | Hazardous Materials Transportation Regulations (49 CFR 172-173) | G ✓ |
| 4. | Worker Right-to-Know Regulations (29 CFR 1910.1200) | G ✓ |
| 5. | Community Right-to-Know Regulations (40 CFR 350-372) | G ✓ |

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- | | | |
|----|-------|----------|
| 6. | _____ | G |
| 7. | _____ | G |

Solid Waste Management

- | | | |
|----|---|----------|
| 1. | Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) | G |
| 2. | Permit Requirements for Solid Waste Disposal Facilities | G |
| 3. | Installation of Systems of Refuse Disposal | G |
| 4. | Solid Waste Storage and Removal Requirements | G |
| 5. | Disposal Requirements for Special Wastes | G |

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- | | | |
|----|-------|----------|
| 6. | _____ | G |
| 7. | _____ | G |

Water Pollution Control Requirements

- | | | |
|----|---|------------|
| 1. | Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | G |
| 2. | Designation of Hazardous Substances (40 CFR 116) | G |
| 3. | Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | G |
| 4. | NPDES Permit Requirements (40 CFR 122) | G |
| 5. | Toxic Pollutant Effluent Standards (40 CFR 129) | G |
| 6. | General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | G ✓ |
| 7. | Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | G |

- | | | |
|-----|---|-----|
| 8. | Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | G |
| 9. | Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | G |
| 10. | Water Quality Standards | G |
| 11. | Effluent Limitations for Direct Dischargers | G |
| 12. | Permit Monitoring/Reporting Requirements | G ✓ |
| 13. | Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | G ✓ |
| 14. | Collection, Handling, Processing of Sewage Sludge | G |
| 15. | Oil Discharge Containment, Control and Cleanup | G |
| 16. | Standards Applicable to Indirect Discharges (Pretreatment) | G |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- | | | |
|-----|---|---|
| 17. | <u>PTC WSA INDUSTRIAL DISCHARGE PERMIT # 99-01</u> | G |
| 18. | <u>40 CFR 433.10 (SUB PART A - METAL FINISHING)</u> | G |

Drinking Water Regulations

- | | | |
|----|---|---|
| 1. | Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | G |
| 2. | National Primary Drinking Water Standards (40 CFR 141) | G |
| 3. | Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | G |
| 4. | Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | G |
| 5. | Underground Injection Control Requirements | G |
| 6. | Monitoring, Reporting and Record keeping Requirements for Community Water Systems | G |

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)

- | | | |
|----|-------|---|
| 7. | _____ | G |
| 8. | _____ | G |

Toxic Substances

- | | |
|----|---|
| 1. | Manufacture and Import of Chemicals, Record keeping and Reporting |
|----|---|

- | | | |
|----|--|------------|
| | Requirements (40 CFR 704) | G ✓ |
| 2. | Import and Export of Chemicals (40 CFR 707) | G ✓ |
| 3. | Chemical Substances Inventory Reporting Requirements (40 CFR 710) | G |
| 4. | Chemical Information Rules (40 CFR 712) | G |
| 5. | Health and Safety Data Reporting (40 CFR 716) | G |
| 6. | Pre-Manufacture Notifications (40 CFR 720) | G |
| 7. | PCB Distribution Use, Storage and Disposal (40 CFR 761) | G |
| 8. | Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) | G |
| 9. | Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) | G |

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above
(*identify*)

- | | | |
|-----|-------|----------|
| 10. | _____ | G |
| 11. | _____ | G |

Pesticide Regulations

- | | | |
|----|--|----------|
| 1. | FIFRA Pesticide Use Classification (40 CFR 162) | G |
| 2. | Procedures for Disposal and Storage of Pesticides and Containers
(40 CFR 165) | G |
| 3. | Certification of Pesticide Applications (40 CFR 171) | G |
| 4. | Pesticide Licensing Requirements | G |
| 5. | Labeling of Pesticides | G |
| 6. | Pesticide Sales, Permits, Records, Application and Disposal Requirements | G |
| 7. | Disposal of Pesticide Containers | G |
| 8. | Restricted Use and Prohibited Pesticides | G |

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (*identify*)

- | | | |
|-----|-------|----------|
| 9. | _____ | G |
| 10. | _____ | G |

Environmental Clean-Up, Restoration, Corrective Action

- | | | |
|----|---|----------|
| 1. | Comprehensive Environmental Response, Compensation and Liability
Act (Superfund) (<i>identify</i>) | |
| | _____ | G |
| | _____ | G |

2. RCRA Corrective Action (*identify*)

_____ **G**

_____ **G**

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective
Action Regulations Not Listed Above (*identify*)**

3. _____ **G**

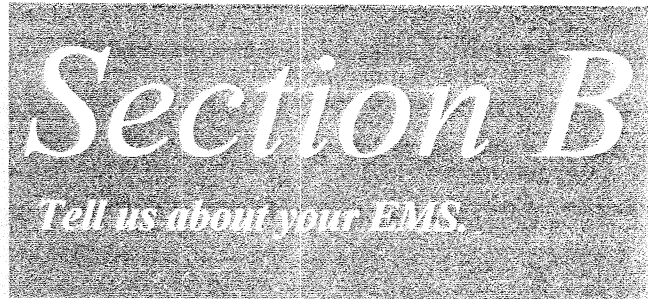
4. _____ **G**

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|--|---|
| <i>a.</i> Environmental policy | <input checked="" type="checkbox"/> Yes |
| <i>b.</i> Planning | <input checked="" type="checkbox"/> Yes |
| <i>c.</i> Implementation and operation | <input checked="" type="checkbox"/> Yes |
| <i>d.</i> Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| <i>e.</i> Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste : Metal Hydroxide Filter Cake Sludge (F006).	2000	lbs/month	650	lbs/month
<p>i. How is the current level an improvement over the previous level?</p> <p>Heated-air dewatering system has achieved a 68% reduction by weight per month even with the production quantities being double from the previous two (2) years before. TDK has also switched from land fill disposal to a metals recycling facility.</p> <p>ii. How did you achieve this improvement?</p> <p>Improved de-watering of the filter cake was achieved by installing a inline air heater for better drying percentage. The original ratio was 75% water - 25% solid. The current ratio is 95% solid - 5% water. The inline air heater has shown more efficient drying in half the time of the original drying procedure and a major volume reduction.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste : Methanol	.93	gal/10 million chips	.20	gal/10 million chips
<p>i. How is the current level an improvement over the previous level?</p> <p>TDK has reduced usage of methanol by 75%. Along with the reduced usage, the recovery unit has shown a 20% decrease in waste.</p>				
<p>ii. How did you achieve this improvement?</p> <p>A methanol recovery unit was purchased and process handling procedures of methanol was evaluated and improved. The methanol recovery unit allows the methanol to be close loop recycled before new methanol is used.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? **Copper Waste Recycling**
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value **Non - Recycled (Quantity/Units)**
- ☐ Option B: In terms of units of production or output **(Quantity/Units)**

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 100% Recycled
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Research and find a recycling facility that will agree to recover the copper.

Second aspect you've selected

a. What is the aspect?

Maintenance Waste (Wipes & Waste Oil)

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value Non - Recycled
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 100% Recycling
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Manage the waste oil as universal waste and recycle.
Recycle the maintenance waste as well.

Third aspect you've selected

- a. What is the aspect? Waste Water Ni ppm
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value .35 ppm (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value Less than or = to .35ppm (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? Currently TDK has two Electroplating lines. Our permitted limit is 1.52ppm daily which we have worked hard with improvements to keep our discharge well below. TDK plans to add an additional EP line this year, bringing the count to three lines. Even with the additional load of Nickel rinse we are committed to maintaining at or below 0.35ppm through continuous maintenance and chemistry adjustments.

Fourth aspect you've selected

- a. What is the aspect? Alumina Oxide Powder
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 97 lbs. (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 0 lbs. (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? By improving the characteristics of the paste applied to our product, we may be able to eliminate the use of Alumina Oxide powder during the Firing part of the process. The goal is by 4TH Qtr. FY 2000.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Procedures Attached

EMS-443-02

2 How do you inform community members of important matters that affect them?

Procedure Attached

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☐ Open Houses

☒ Other

Brochures

**TCU EMS Procedure
EMS-443-02****Communication with External Parties****I. Purpose:**

This procedure is intended to establish a process for outreach and communication with external parties regarding the organization's environmental management system

II. Scope:

This procedure describes how the organization receives, documents, and responds to communications from external parties. In addition, it discusses proactive steps that the organization takes to maintain a meaningful dialog with external parties on environmental matters.

III. Definitions:

Interested Parties: Individuals or groups with an interest in the environmental impacts of TCU's products, activities or services. These parties include regulators, local residents, employees, stockholders, insurers, customers, environmental groups and the general public.

IV. General:

TCU uses a number of mechanisms to ensure effective communication with interested parties. These mechanisms include regulatory filings (such as permit applications and reports), open houses, press releases and informal discussions with regulators, community representatives, and local business leaders. Company brochures, Annual Reports and TDK's web page are also used for communication with external parties.

To solicit the views of interested parties, the organization may use additional techniques, including (but not limited to) Local Emergency Planning, newsletters, or informal meetings with representatives of external groups.

**UNCONTROLLED
COPY**

V. Procedure:

A. Management of Communications from External Parties

1. Top Management has designated the EMS Manager as the single contact point at TCU for receiving and responding to letters, telephone calls or other communication from external interested parties regarding TCU's environmental aspects and environmental management system.
2. Copies of all written communications on environmental matters are maintained by the EMS Manager. All non-written communications from external parties are documented using telephone logs or similar note forms.
3. A record of all communications with external parties is maintained by the EMS Manager in files designated for that purpose. The Log of external communications is found attached in EMS-443-02^F01.

B. Outreach to Interested Parties

1. On an as-needed basis, the organization initiates communication of interested parties on its environmental management system, its environmental performance, and other related matters. In particular, such outreach is conducted when significant changes at the facility are being considered, such as facility expansion or other actions that might affect the actual or potential environmental impacts of the organization's products, activities, or services.
2. As part of the Management Review process, proactive efforts to communicate with external parties are evaluated. Based on this evaluation and other factors, the organization's management determines the need for outreach with external parties in the coming year and how such communications can be carried out most effectively. An example of such annual proactive efforts is TCU's display at the Annual International Society Picnic held in Peachtree City. This display includes information about TCU's Environmental Aspects.

C. External Hazard and Emergency Communication

All external communication regarding emergency response are addressed in Procedure ADM-OPP-205.

**UNCONTROLLED
COPY**

Approved by: *[Signature]* Date: JUN 7 '99 Drawn by: *[Signature]* Date: JUN 7 '99 cc# 12 copy# 1

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Concerned Citizen	Mr. Steve Brown	770-487-3354
<i>State/Local Regulator</i>	PTC Water & Sewerage Authority	Susan Johnson	770-487-7993
<i>Other community/local reference</i>	Fayette County Fire & Emergency Services	Pete Nelms	770-461-1321

Section E

Application and Participation Statement

On behalf of TDK Components USA, Inc.
[my facility],


I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

 9-25-2000

Printed Name/Title William Nutt (EMS Manager)

Facility Name TDK Components USA, Inc.

Facility Street Address 1 TDK Blvd. Peachtree City Ga. 30269

Facility ID Numbers

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

**The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140**